

**REMARKS**

Initially, in the Office Action dated April 22, 2004, the Examiner objects to claim 1 because of informalities. Claims 1-8 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,149,441 (Pellegrino et al.) in view of U.S. Patent No. 6,201,948 (Cook et al.).

By the present response, Applicants have submitted new claim 9 for consideration by the Examiner and assert that this claim does not contain any prohibited new matter. Applicants have amended claims 1-3, 5-8 to further clarify the invention. Claims 1-9 remain pending in the present application.

**Claim Objections**

Claim 1 has been objected to because of informalities. Applicants have amended this claim to further clarify the invention and respectfully request that this rejection be withdrawn.

**35 U.S.C. §103 Rejections**

Claims 1-8 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Pellegrino et al. in view of Cook et al. The deficiencies of Pellegrino et al. have been discussed in Applicants' previously-filed response. Applicants respectfully traverse these rejections and provide the following additional remarks.

Cook et al. discloses a system and method for interactive, adaptive and individualized computer-assisted instruction. This includes an agent for each student which adapts to its student and provides individualized guidance to the student and

controls the augmented computer assisted instructional materials. The instructional materials are augmented to communicate the students' performance and the material's pedagogical characteristics to the agent and to receive control from the agent.

Regarding claims 1, 6, 7 and 8, Applicants submit that none of the cited references, taken alone or in any proper combination, disclose, suggest or render obvious the limitations in the combination of each of these claims of, inter alia, collaborative learning between a learning management server and a plurality of clients via a network that includes a learning management server that includes activity model data representative of a set of links including a plurality of combinations of roles and behaviors performed between the roles, a role table storing a correspondence of each user ID and resource relative to each role and an operation interpretation table to be used for converting the request into behavior descriptive data indicating behavior or the resource performed by the client. The Examiner appears to assert that Pellegrino et al. discloses several of the limitations in the claims of the present application in col. 10, line 67 - col. 11, line 4. However, these five lines in Pellegrino et al. merely disclose that the computer based educational system identifies authorized users, ascribes a "type" to each user and permits access to certain features of the system depending upon the "type" ascribed to the user. Thus, a user's permission for accessing to certain features is decided upon a type of the user. Further, the relationship between the type and the access permission seems to be registered and fixed in a class and user management

module 76 (see col. 11, lines 4-6). This is not an activity model data representative of a set of links including a plurality of combinations of roles and behaviors performed between the roles, as recited in the claims of the present application.

These portions of Pellegrino et al. do not disclose or suggest links, or combinations of roles and behaviors performed between the roles. These portions merely disclose access to certain features being decided upon a type of the user. Moreover, these portions of Pellegrino et al. do not disclose or suggest a table, or specifically a role table storing a correspondence of each user ID and resource relative to each role.

These limitations in the claims of the present application would not be inherent from this scant disclosure in Pellegrino et al. Further, these five lines of Pellegrino et al. do not disclose or suggest an operation interpretation table to be used for converting the request into behavior descriptive data indicating behavior for the resource performed by the client, as recited in the claims of the present application.

The Examiner further states disagreement with Applicants' previously-filed arguments that Pellegrino et al. does not disclose an activity model data, and asserts that the "features" in Pellegrino et al. corresponds to behaviors that can be performed by the different roles of his system which corresponds to the activity model data as recited in the claims of the present application, and further cites col. 10, lines 50-66. However, these portions merely disclose details of a teacher home page and do not disclose or suggest activity model data representative of a set of links including a plurality of combination of roles and behaviors performed between the roles, as recited in the claims of the present application.

The Examiner admits that Pellegrino et al. does not disclose a role table or an operation interpretation table, but asserts that Cook et al. discloses these limitations by Table 13 and Table 7, respectively. However, Table 13 in Cook et al. merely discloses a table of "student data use in agent behavior" that includes a column describing "student data" and another column describing "effects". An item listed under student data is "student persona choice", and the corresponding item under effects is "display persona, indicating type of character, voice inflection, activity rate". This is not an operation interpretation table to be used for converting the request into behavior descriptive data indicating behavior for the resource performed by the client, as recited in the claims of the present application. This Table 13 in Cook et al. relates to student data and an effect, and does not disclose or suggest converting a request into behavior descriptive data, or behavior descriptive data indicating behavior for a resource performed by the client. Further, Table 7 in Cook et al. merely discloses a "policy filter table" that includes both a conditional proposition and a hypothetical proposition. The conditional proposition shown in Cook et al. includes a Boolean expression  $B(p_1, p_2, \dots, p_n)$  of one or more conditions, each of which is a function of available parameters. The hypothetical proposition in Cook et al. is a list including an agent action type called "type", an agent action subtype called "subtype" and zero or more parameters called " $x_n$ ". The "type" shown in Cook et al. means a major mode of agent behavior such as "to congratulate the student", and "subtype" only means one modification for the behavior, for example, "because of the student's rate". This is not a role table storing a correspondence of each user ID and resource

relative to each role, as recited in the claims of the present application. Table 7 in Cook et al. discloses two columns, one entitled "active" column with either Y or N and the other entitled "rule" column including the conditional and hypothetical propositions. Table 7 in Cook et al. does not disclose or suggest a user ID, a resource relative to a role, or a correspondence of each user ID and resource relative to each role.

Regarding claims 2-5 and new claim 9, Applicants submit that these claims are dependent on independent claim 1 and, therefore, are patentable at least for the same reasons noted regarding this independent claim. For example, Applicants submit that none of the cited references disclose or suggest where a plurality of activity model data sets is provided within the learning management server, and the operation interpretation means notifies the resource operations means of a permission of a request operation if the behavior descriptive data is coincident with anyone of the activity model data sets.

Accordingly, Applicants submit that none of the cited references, taken alone or in any proper combination, disclose, suggest or render obvious the limitations in the combination of each of claims 1-9 of the present application. Applicants respectfully request that these rejections be withdrawn and that these claims be allowed.

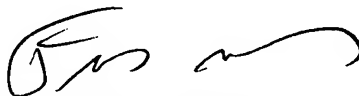
Applicants note that in the Examiner's comments regarding claims 5-8, the Examiner makes reference to an "Anderson" reference that was not listed as a basis for rejection in the Office Action, paragraph 1.

In view of the foregoing amendments and remarks, Applicants submit that claims 1-9 are now in condition for allowance. Accordingly, early allowance of such claims is respectfully requested.

To the extent necessary, Applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of Antonelli, Terry, Stout & Kraus, LLP, Deposit Account No. 01-2135 (referencing attorney docket no. 500.41128X00).

Respectfully submitted,

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